

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: PHILIPS RECALLED CPAP, BI-LEVEL PAP,)	
AND MECHANICAL VENTILATOR PRODUCTS)	
LITIGATION)	
IN RE: SOCLEAN, INC. MARKETING, SALES)	
PRACTICES AND PRODUCTS LIABILITY)	
LITIGATION)	
This document relates to:)	
<i>Koninklijke Philips N.V. et al. v. SoClean, Inc. & DW</i>)	Master Docket Nos. 21-mc-1230
<i>Mgmt. Servs., LLC</i>)	and 22-mc-152
(MDL 3014, ECF No. 2922))	MDL Nos. 3014 and 3021
<i>Philips RS North America LLC v. SoClean, Inc. et al.</i>)	
(MDL 3021, ECF No. 653))	
<i>Koninklijke Philips N.V. et al. v. SoClean, Inc. & DW</i>)	
<i>Mgmt. Servs., LLC</i>)	
(MDL 3021, ECF No. 507))	
<i>SoClean, Inc. v. Koninklijke Philips N.V. et al.</i>)	
(MDL 3021, ECF No. 211))	

**MOTION FOR ENTRY OF SCHEDULING ORDER GOVERNING ALL LITIGATION
BETWEEN THE PHILIPS PARTIES AND THE SOCLEAN PARTIES**

There are four litigation tracks between the various Philips, SoClean and DW parties: (1) SoClean's affirmative claims (MDL 3021, ECF No. 211), (2) Philips' counterclaims (MDL 3021, ECF No. 507), (3) Philips' contribution claims (personal injury) (MDL 3014, ECF 2922), and (4) Philips' assigned claims (property damage economic loss) (MDL 3021 ECF No. 653). The parties have engaged in extensive discussions, overseen by Special Master Katz, to attempt to reach agreement on a scheduling order to govern these proceedings. However, the parties were unable to reach agreement on a joint schedule. A number of significant areas of disagreement remain.

The attached schedule (Ex. 1) is the parties' attempt to lay out their proposals and the disputes that remain. In addition, because the various footnotes in the attachment have become somewhat unwieldy, the Philips parties are submitting a separate brief (Ex. 2) laying out their positions on each disputed item. The SoClean and DW parties have declined to file a separate brief at this time.

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Respectfully submitted,

/s/ Michael H. Steinberg

Michael H. Steinberg (CA Bar No. 134179)
steinbergm@sullcrom.com
SULLIVAN & CROMWELL LLP
1888 Century Park East
Los Angeles, CA 90067
Tel: (310) 712-6670
Fax: (310) 712-8800

/s/ Tracy Richelle High

Tracy Richelle High (NY Bar No. 3020096)
hight@sullcrom.com
William B. Monahan (NY Bar No. 4229027)
monahanw@sullcrom.com
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, NY 10004-2498
Tel: (212) 558-4000
Fax: (212) 558-3588

*Counsel for Koninklijke Philips N.V. and
Philips North America LLC*

/s/ Erik T. Koons

Erik T. Koons (NY Bar No. 2941102)
erik.koons@bakerbotts.com
BAKER BOTT S LLP
700 K Street, N.W.
Washington, D.C. 20001
Tel: (202) 639-7973
Fax: (202) 585-1086

/s/ Andrew T. George

Andrew T. George (PA Bar No. 208618)
andrew.george@bgblawyers.com
BOURELLY, GEORGE & BRODEY LLP
1050 30th Street, NW
Washington, DC 20007
Tel: (202) 753-5012
Fax: (703) 465-8104

Counsel for Philips RS North America LLC